

## REMARKS/ARGUMENTS

### STATUS OF THE CLAIMS

Applicants have amended Claim 1 and 16. Applicants respectfully request reconsideration of pending Claims 1-5, 9-11, 13 and 15-16 in light of the following remarks.

### CLAIM REJECTION - 35 U.S.C. § 112

Claim 16 stands rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regard as the invention. Applicants have amended Claim 16 to overcome the claim rejection under 35 U.S.C. § 112, second paragraph. Accordingly, Applicants respectfully request withdrawal of this rejection.

### CLAIM REJECTIONS – 35 U.S.C. §§ 102(b) and 103(a) – Darby

#### Independent Claims 1 and 16

Claims 1 and 16 stand rejected under 35 U.S.C. 102(b) as being anticipated by U.S. Patent No. 5,720,411 issued to Darby et al. (hereinafter “Darby”). Claims 1 and 16 also stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Darby.

Amended Claim 1 specifies a “securing plate member including a tubular boss having an internally threaded portion” and a “universal head member including a tubular element having an externally threaded portion a distance from a distal end of the tubular element.” Amended Claim 16 specifies a “securing plate member including a tubular boss having an internally threaded portion complementary to the tubular element of the universal head member, the securing plate member engaging the tubular element at the externally threaded portion, the externally threaded portion located a distance from a distal end of the tubular element of the universal head member.”

Darby discloses a pressure vessel 11 including a shell 15 having a groove 27, a dome-shaped element 39 with a tubular connector 55, a tubular boss 51 with a central opening 47, a securing plate 41, and a removable locking ring 79 in form of a helical band. “The tubular connector 55 which carries an elastomeric seal 57 and which has an externally threaded outer end 59 extends through the central opening 47 and the tubular boss 51; it interconnects the securing plate 41 within the dome-shaped element 39 upon installation of a threaded hex-shaped nut 61.” *Darby*, col. 7, l. 46-51. In another embodiment, Darby discloses a pressure vessel 95 including a plug 99 and a tubular connector 101, in which “the tubular connector 101 is locked to the plug 99 by a standard snap ring 119 which is received in a groove that is appropriately provided in the outer surface of the connector just to the left of its outer end section, which is provided with a male pipe thread 121.” *Darby*, col. 11, l. 36-41.

Darby only discloses tubular connectors 55, 101 with threaded distal ends 59, 121. Accordingly, Darby does not disclose “securing plate member including a tubular boss having an internally threaded portion” and a “universal head member including a tubular element having an externally threaded portion a distance from a distal end of the tubular element.” Applicants respectfully submit the above argument in addition to the arguments previously submitted in the Amendment dated January 28, 2008. Thus, independent Claims 1 and 16 and dependent Claims 2-5, 9-11, 13, and 15 are allowable.

Dependent Claims 4, 5, 10, 11, 13, and 15

Claims 4, 5, 10, 11, 13, and 15 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Darby. Claims 4, 5, 10, 11, 13, and 15 depend from Claim 1 and are therefore allowable for the reasons discussed with respect to Claim 1. Claims 4, 5, 10, 11, 13, and 15 also specify additional patentable subject matter not specifically discussed herein.

Claims 4, 5, 9-11, 13, and 15 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Darby. Claims 4, 5, 9-11, 13, and 15 depend from Claim 1 and are therefore allowable for the reasons discussed with respect to Claim 1. Claims 4, 5, 9-11, 13, and 15 also specify additional patentable subject matter not specifically discussed herein.

CLAIM REJECTIONS – 35 U.S.C. § 103(a) – Darby and Brock

Independent Claims 1 and 16

Claims 1 and 16 also stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Darby in view of U.S. Pat. No. 2,401,856 issued to Brock (hereinafter “Brock”).

Brock does not cure the deficiencies of Darby discussed above. Brock teaches different designs of retaining washers with elements of those washers connected to a solid center piece or a centrally aligned ring. If the retaining washer of Brock is the “retainer ring” of Claims 1 and 16, the installation of the universal head member is obstructed by the centerpiece, whether the centerpiece of the retaining washer being solid or hollow.

Accordingly, neither Darby nor Brock, either alone or in combination, teaches or suggests a retainer ring including “three individual and separate arced elements linked to each other.” Applicants respectfully submit the above argument in addition to the arguments previously submitted in the Amendment dated January 28, 2008. Thus, independent Claims 1 and 16 and dependent Claims 2-5, 9-11, 13, and 15 are allowable.

Dependent Claims 4, 5, 9-11, 13, and 15

Claims 4, 5, 9-11, 13, and 15 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Darby in view of Brock. Claims 4, 5, 9-11, 13, and 15 depend from Claim 1 and are therefore allowable for the reasons discussed with respect to Claim 1. Claims 4, 5, 9-11, 13, and 15 also specify additional patentable subject matter not specifically discussed herein.

CLAIM REJECTIONS – 35 U.S.C. § 103(a) – Darby and van Os

Independent Claims 1 and 16

Claims 1 and 16 also stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Darby in view of U.S. Pat. No. 4,562,798 to van Os (hereinafter “van Os”).

van Os does not cure the deficiencies of Darby discussed above. van Os teaches a cylinder head locking construction including a clamping ring 15 to secure a tapered ring 13 to a cylinder head 3. A circumferential outer surface of the clamping ring 15 pushes the tapered ring 13 firmly into a tapered groove 9. As shown in Figure 5 of van Os, the clamping ring 15 includes three elements, which are bolted directly to the cylinder head 3 with bolts 19. If the tapered ring 13 and the clamping ring 15 of van Os are the “retainer ring” of Claims 1 and 16, as argued by the Examiner on page 5 of the Office Action, van Os does not teach a securing plate member engaged with the cylinder head 3 and the tapered ring 13/clamping ring 15. Also, van Os does not teach any structure that includes a threaded tubular boss or a threaded tubular element.

Accordingly, neither Darby nor van Os, either alone or in combination, teaches or suggests “three individual and separate arced elements linked to each other,” “a securing plate member including a tubular boss having an internally threaded portion,” and a “universal head member including a tubular element having an externally threaded portion a distance from a distal end of the tubular element,” as specified by Claims 1 and 16. Thus, independent Claims 1 and 16 and dependent Claims 2-5, 9-11, 13, and 15 are allowable.

Dependent Claims 4, 5, 9-11, 13, and 15

Claims 4, 5, 9-11, 13, and 15 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Darby in view of van Os. Claims 4, 5, 9-11, 13, and 15 depend from Claim 1 and are therefore allowable for the reasons discussed with respect to Claim 1. Claims 4, 5, 9-11, 13, and 15 also specify additional patentable subject matter not specifically discussed herein.

CLAIM REJECTIONS – 35 U.S.C. § 103(a) – Darby, Brock, van Os, Galasso

Dependent Claims 2 and 3

Claims 2 and 3 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Darby or Darby in view of Brock, or Darby in view of van Os, in view of U.S. Pat. No. 3,447,712 issued to Galasso et al. (hereinafter “Galasso”). Claim 2 specifies “an elliptical head member” and Claim 3 specifies “wherein the elliptical head member is in contact with the universal head member.”

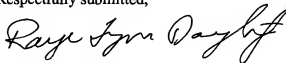
Galasso does not cure the deficiencies of Darby, Brock, or van Os. Galasso teaches a centrifuge test tube cap including a stem, a seal washer, and a boss. Galasso teaches that “[t]he seal washer 160 is generally cylindrical, having an outside diameter approximately equal to that of the boss 114.” As a result, the boss, the washer, the stem, and the test tube are all circular (as illustrates in FIG. 5 of Galasso).

Neither Darby, Brock, van Os nor Galasso, either alone or in combination, teaches or suggests an elliptical head member. In light of the above, Claims 2 and 3 also further patentable subject matter.

CONCLUSION

In view of the above, Applicant respectfully requests entry of the Amendment and reconsideration of pending Claims 1-5, 9-11, 13, 15 and 16.

Respectfully submitted,



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